

FILED

DEC 16 2011

RICHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 MIRANDA KANE (CABN 150630)
3 Chief, Criminal Division

4 THOMAS E. STEVENS (CABN 168362)
Assistant United States Attorney

5 450 Golden Gate Ave., Box 36055
6 San Francisco, California 94102
Telephone: (415) 436-7200
7 Fax: (415) 436-7234
E-Mail: Thomas.Stevens@usdoj.gov

8 Attorney for the United States

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16
17 DENNIS L. DANG,

18 Defendant.
19

CR-11-0915 JW

STIPULATION AND [PROPOSED]
ORDER RE: SPEEDY TRIAL ACT

20 The above-captioned matter came before the Court on December 14, 2011, for
21 arraignment. Defendant was represented by Daniel Blank. The Court set the case for bond
22 proceedings before the duty magistrate judge on December 27, 2011.

23 During the December 14 hearing, the Court made findings that the time from and
24 including December 14, 2011, through and including December 27, 2011, should be excluded
25 under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), because the ends of justice served by
26 taking such action outweighed the best interest of the public and defendant in a speedy trial. The
27 findings were based upon the need for the defendant and the government to have reasonable time
28

STIPULATION AND [PROPOSED] ORDER RE: STA
CR-11-0915 JW

1 necessary for effective preparation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

2 The parties hereby agree, and request, that the exclusion of time described above, be
3 granted. The parties agree and stipulate that the additional time is appropriate and necessary
4 under Title 18, United States Code, § 3161(h)(7)(A), because the needs of justice served by the
5 continuance outweighs the best interest of the public and the defendant in a speedy trial. This
6 time exclusion will allow counsel for the defendant and the government effectively to prepare,
7 taking into account the exercise of due diligence.

8
9 Dated: December 15, 2011

/s

DANIEL P. BLANK
Counsel for Dennis L. Dang

12 Dated: December 15, 2011

/s

THOMAS E. STEVENS
Assistant U.S. Attorney

15 IT IS SO ORDERED.

16
17
18 Dated: December 15, 2011



HON. ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE